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February 22, 2008

VIA FEDERAL EXPRESS

Linda Ketellapper, SFD-7-5
United States Environmental Protection Agency, Region IX
75 Hawthorne Street
San Francisco, CA 94105

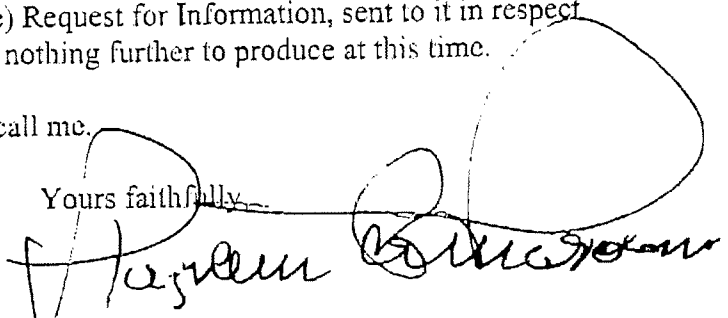
**Re: *Omega Superfund Site/104(e) Request for Information to
Air Liquide America L.P.***

Dear Ms. Ketellapper:

I am enclosing Air Liquide America L.P.'s ("ALALP") Supplemental Response to Request Number 7 of the Section 104(e) Request for Information, sent to it in respect of the Omega Superfund Site. ALALP has nothing further to produce at this time.

If you have any questions, please call me.

Yours faithfully,


STEPHEN G. MASON

SGM:lam

cc: Stephen D. Berninger, Regional Counsel
Stephanie K. Payne, Esq.
Donna Smith

STEPHANIE K. PAYNE
 GENERAL COUNSEL & VICE PRESIDENT
 QUALITY & REGULATORY AFFAIRS
 AIR LIQUIDE USA LLC
 2700 POST OAK BOULEVARD, SUITE 1800
 HOUSTON, TEXAS 77056
 (713) 624-8387 • (713) 402-2053 [fax]

STEPHEN G. MASON
 OF COUNSEL
 NEWELL, CAMPBELL & ROCHÉ LLP
 520 SOUTH GRAND AVENUE, SUITE 390
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Attorneys for Respondent Air Liquide America L.P.

BEFORE THE UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
 REGION IX

In Re: OMEGA SUPERFUND SITE,

Real Property: 8832-8838 Dice Rd.
 Santa Fe Springs, California

APN: 8168-012-010

)
) SUPPLEMENTAL RESPONSE
) OF AIR LIQUIDE AMERICA
) L.P. TO 104(e) REQUEST FOR
) INFORMATION; REQUEST
) NO. 7

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PRELIMINARY STATEMENT

Air Liquide America L.P. ("ALALP") hereby supplements its response to Request No. 7 of the 104(e) Request for Information ("RFI") of the United States Environmental Protection Agency ("EPA") with such completeness as is reasonably possible given the scope of the RFI. ALALP reserves the right to supplement or amend this response further based upon new information, or upon existing information that has been newly discovered.

**Omega Superfund Site
Supplemental Response of Air Liquide America L.P. to 104(e) Request; Request No. 7**

All current and former employees who were consulted and who gathered information for this supplemental response acted at the specific direction of supervising counsel. Each is represented by supervising counsel in respect of this matter. Accordingly, all further contact of any kind concerning this matter should be directed to:

Stephanie K. Payne, Esq.
General Counsel & Vice President
Quality & Regulatory Affairs
Air Liquide USA LLC
2700 Post Oak Boulevard, Suite 1800
Houston, Texas 77056
(714) 624-8387 • (714) 402-2053

GENERAL OBJECTIONS

ALALP objects to "Instruction No. 7" to the extent it would require the disclosure of information, in whatever form held, protected by the attorney-client privilege, the attorney work product doctrine, the joint defense privilege or the common interest privilege. CERCLA section 104(e) neither preempts nor abrogates state statutory or common law privileges. Therefore, responsive "information and documents independently developed or obtained by research on the part of [ALALP or any of its affiliates by] its attorneys," or consultants, agents or employees working at the direction of counsel, may be privileged or otherwise protected from disclosure. In such cases, ALALP will provide a log listing documents withheld from production.

These General Objections shall be deemed to be incorporated by reference into the supplemental response below as if set forth fully and completely.

ACRONYMS/INITIALS/SHORT NAMES

A glossary of acronyms, initials and short names appears as Exhibit A to ALALP's initial responses.

REQUEST NO. 7

Provide a list of employees who had knowledge of the use and disposal of hazardous substances at the Air Liquide facility at the Properties during the entire time period that Air Liquide or any of its predecessors, successors, subsidiaries, affiliates, contractors, trustees, assigns or agents, was associated with this facility. For each employee listed, provide the following information:

- a. The employee's full name;

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- b. The employee's current or last known address(es) and telephone number(s), including the last known date on which you believe each address and telephone number was current;
- c. The employee's Social Security Number;
- d. Identify the entire time period that the employee worked at the facility; and
- e. The position(s) the employee held with each business entity during his or her entire period of employment at the facility and the year or years that the employee held each listed position.

SUPPLEMENTAL RESPONSE TO NO. 7

In addition to its General Objections, which are incorporated herein by reference, ALALP objects further on grounds that Request Nos. 7b and 7c are violative of the right of privacy expressly conferred upon citizens of the State of California by Article I, section 1 of the California Constitution. ALALP objects further on grounds that disclosing the addresses, telephone and social security numbers of current or former employees in this response makes such information part of an unprotected public record, and could subject such current or former employees to identity theft, financial fraud or other harms and invasions of privacy. ALALP objects further on grounds that disclosing such information could subject ALALP to liability for the violation of constitutional, statutory and common law privacy rights.

Without waiving the foregoing objections, and subject thereto, ALALP responds as follows:

FOIA ex 6, Personal Privacy



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FOIA ex 6, Personal Privacy



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FOIA ex 6, Personal Privacy



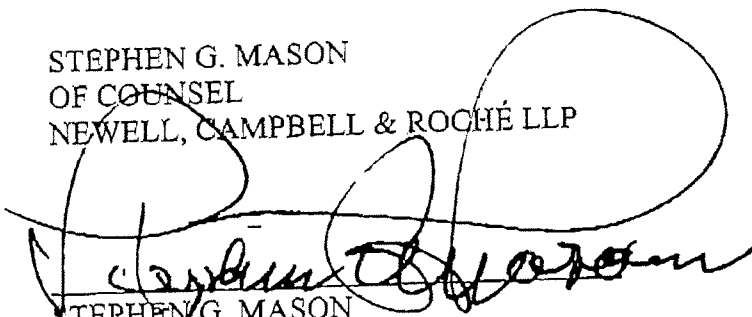
**Omega Superfund Site
Supplemental Response of Air Liquide America L.P. to 104(e) Request; Request No. 7**

FOIA ex 6, Personal Privacy



Dated: February 22, 2008

STEPHEN G. MASON
OF COUNSEL
NEWELL, CAMPBELL & ROCHÉ LLP



STEPHEN G. MASON
Attorney for Respondent,
Air Liquide America L.P.

February 22, 2008

VIA FEDERAL EXPRESS

Linda Ketellapper, SFD-7-5
United States Environmental Protection Agency, Region IX
75 Hawthorne Street
San Francisco, CA 94105

**Re: Omega Superfund Site/104(e) Request for Information to
Air Liquide America LP,**

Dear Ms. Ketellapper:

I am enclosing ⁹herewith Air Liquide America LP's Supplemental Response to Request Number 7 of the Section 104(e) Request for Information in respect of the Omega Superfund Site. ~~This concludes ALAP's production.~~ ^(ALAP) sent to it

If you have any questions, please call me.

Yours faithfully,

STEPHEN G. MASON

SGM:lam

cc: Stephanie K. Payne, Esq.
Donna Smith

Steph

has nothing further,
to produce
at this
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